

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Christopher Ramirez,

Case No. 1:24-mj-30415

Judge: Morris, Patricia T.

Filed: 09-27-2024

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 30, 2024 in the county of Saginaw in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C §922(o)

Offense Description
Possession of a Machine Gun

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 27, 2024

City and state: Bay City, Michigan


Complainant's signature

Special Agent, Kyle McGraw ATF
Printed name and title


Judge's signature

Hon. Patricia T. Morris, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Kyle McGraw, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent employed with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), U.S. Justice Department, and have been so employed since November 7, 2016. I successfully completed the Criminal Investigations Training Program (CITP) at the Federal Law Enforcement Training Center (FLETC), Brunswick, Georgia. I also completed the Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Basic Training (SABT) National Training Academy conducted in Brunswick, Georgia. During these courses of study, I received training in the investigation of federal firearm and narcotics violations. Previously, I was a certified law enforcement officer in Michigan with the City of Saginaw Police Department and the Saginaw Township Police Department for a total of five years. During which time, I spent two years on the Bay Area Narcotics Enforcement Team (BAYANET) enforcing state narcotics and firearms violations. I personally investigated and assisted in numerous of cases, which led to search warrants, arrests, prosecutions, and the seizure of large quantities of narcotics and firearms. During my employment with ATF, I have conducted or participated in investigations related to the possession and

manufacture of firearms and narcotics in violation of Titles 18, 21, and 26 of the United States Code.

2. This affidavit is being submitted for the purpose of obtaining a criminal complaint and arrest warrant for Christopher RAMIREZ for violations of Title 18 U.S.C. §922(o) – possession of a machine gun.

3. I make this affidavit from personal knowledge based on my participation in this investigation, communications with the Saginaw Police Department, and others who have personal knowledge of the events and circumstances described herein, and information gained through my review of relevant documents related to this investigation. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

PROBABLE CAUSE

4. On July 30, 2024, at approximately 12:46 a.m., law enforcement was called to the area of Jackson Street and South Woodbridge Street for a report of multiple shots heard in the area. When law enforcement arrived, they located two victims with multiple gunshot wounds. Both victims were taken to the hospital and the scene was processed by the Michigan State Police MCU. Detectives located approximately 27 fired cartridge casings at the scene and the victim's vehicle which also sustained damage from apparent gunfire.

5. Detectives were able to interview one of the victims, Paris Bryant who was able to give detectives a statement regarding the shooting. Bryant started the interview by stating he had been “set up”. Bryant stated he had been in contact with an individual, later identified as RAMIREZ, to get a firearm. RAMIREZ and Bryant had agreed to meet at 619 S Woodbridge Street, Saginaw, MI, to conduct the exchange. Bryant said he was not buying the gun, just “holding on to it” while he was visiting in town from Texas.

6. Bryant and the second victim arrived at the meeting location, but RAMIREZ was not there and did not answer his phone. They left, but shortly after leaving RAMIREZ contacted them and told them to return. When they returned, the shooting began and both individuals were struck by gunfire before meeting with RAMIREZ.

7. Based on the interview and social media identification of RAMIREZ, MCU detectives obtained a state search warrant for RAMIREZ’s residence at 914 South Mason Street, Saginaw, MI. The search warrant was executed on July 31, 2024, by the Michigan State Police Emergency Services team and RAMIREZ was located inside the home.

8. RAMIREZ was transported to the Saginaw Police Department for a recorded interview. He was read his Miranda rights saying he understood his rights and agreed to waive his rights to answer questions.

9. During the interview, RAMIREZ told detectives there would be ammunition located at his residence because he enjoys shooting guns and he goes to the gun range. RAMIREZ stated he had “SKS ammo, .300 blackout and .556” ammunition in the residence.

10. RAMIREZ’s mother, Alycia Mates, was present during the execution of the search warrant and spoke to detectives on scene. She was asked if there were any firearms in the residence which she initially denied, but when questioned about the firearms registered to her, she said she does own firearms but they’re not at the residence, so RAMIREZ is not around them.

11. Mates then stated it was possible she owns long guns but could not remember if she had any. She said she only has them registered to her because RAMIREZ was on probation and could not register them. She also advised she has seen RAMIREZ with firearms before and on the day of the search warrant at her residence she had seen RAMIREZ with a black pistol in the backyard not long before detectives arrived.

12. Based on this statement, RAMIREZ was questioned as to where the firearm was in the residence. RAMIREZ admitted the firearms were hidden under the carpet in his bedroom closet. He then stated the Palmetto rifle shot in as fully automatic firearm and he had manipulated it with a “drop in” to make it fire as such.

13. During the search warrant, detectives located two firearms in the bedroom believed to be RAMIREZ's room. The firearms were concealed under the carpet in the floor of the closet. One firearm was a Beretta .9mm Luger, Model 8000 D Mini Cougar semiautomatic pistol bearing serial number 026360MZ and a .300 AAC Blackout caliber, Palmetto State Armory, Model PA-15 Automatic Rifle bearing serial number SCD745403.

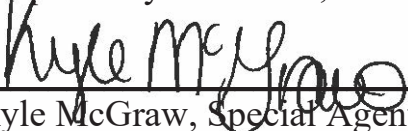
14. The Palmetto rifle was sent to the Michigan State Police Bridgeport Laboratory where it was determined the rifle only fired in a fully automatic state. The firearm appeared to have a drop in auto sear that converted the firearm from a semi-automatic firearm to a fully automatic firearm.

15. A machine gun for the purposes of the National Firearms Act (NFA) under Title 26 U.S.C. § 5845(b) is defined as any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

16. An Automatic Rifle-type machinegun conversion device can be a part, or combination of parts, designed and intended for use in converting a semiautomatic weapon into a machinegun; therefor such item is a "machinegun" as defined in 26 U.S.C. § 5845(b). Automatic Rifle-type machinegun conversion devices manufactured after May 19, 1986, may only be lawfully possessed by a licensed Federal Firearms Licensee. RAMIREZ is not a licensed Federal Firearms Licensee and does not have any NFA weapons registered to him.

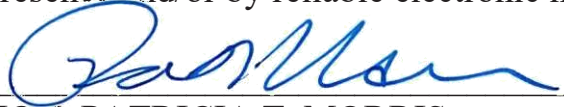
17. Based on the foregoing, I have probable cause to believe that on July 31, 2024, in the Eastern District of Michigan, Christopher RAMIREZ was in violation of 18 U.S.C. §922(o) – possession of a machine gun.

Respectfully submitted,



Kyle McGraw, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means on September 27, 2024.



HON. PATRICIA T. MORRIS
UNITED STATES MAGISTRATE JUDGE